

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER FIELDS, individually, and on behalf of others similarly situated,)	
)	
Plaintiff,)	Case No. 1:20-cv-01277
)	
v.)	Hon. Magistrate Judge M. David Weisman
)	
CARDINAL AUTISM SERVICES LLC and)	
CORNERSTONES AUTISM SERVICES)	
LLC,)	
)	
Defendants.)	

**PLAINTIFF’S UNOPPOSED MOTION TO CERTIFY A COLLECTIVE ACTION
UNDER SECTION 216(b) OF THE FLSA SOLELY FOR SETTLEMENT PURPOSES;
FOR APPROVAL OF AN OPT-IN SETTLEMENT; FOR APPOINTMENT OF
SETTLEMENT ADMINISTRATOR; AND FOR APPROVAL OF AWARDS OF
ATTORNEYS’ FEES AND COSTS**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff’s Unopposed Motion to Certify a Collective Action Under Section 216(b) of the FLSA Solely for Settlement Purposes, for Approval of an Opt-In Settlement, for Appointment of Settlement Administrator; and For Approval of Awards of Attorneys’ Fees and Costs, the Declaration of Nicholas Conlon, and the supporting exhibits, Plaintiff respectfully requests, without opposition from Defendants, that the Court enter an Order approving the parties’ settlement and permitting the parties to effectuate its terms using the forms and procedures set forth in their Agreement. Consistent with the Agreement, Plaintiff also requests that the Court:

- (1) approve Plaintiff’s request for one-third of the settlement fund for attorneys’ fees and reimbursement of an amount not to exceed \$1,049.65;
- (2) appoint Simpluris, Inc. as the third-party Settlement Administrator and approve administration fees and costs in the amount of not to exceed \$7,000; and
- (3) dismiss the action within seven (7) days after the Check Cashing Deadline lapses,

and upon the filing of a Stipulation of Voluntary Dismissal with Prejudice
dismissing the Action.

Respectfully Submitted,

Dated: January 8, 2021

/s Nicholas Conlon
Nicholas Conlon (admitted *pro hac vice*)
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